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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS MOTION IN  
LIMINE NO. 15**

I, Lindsay Cooper, declare as follows:

1. I am an attorney licensed to practice in the State of California and am admitted to practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness I would testify competently to those matters.

2. I make this declaration in support of Waymo’s Administrative Motion to File Under Seal information in its Motion in Limine No. 15 (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Portions of Waymo’s Motion in Limine No. 15 (“Waymo’s Motion”)	Portions highlighted in green	Waymo
Exhibit 2 to Waymo’s Motion	Entire document	Waymo
Exhibit 37 to Uber’s Opposition to Waymo’s Motion in Limine 15 (“Uber’s Opposition”)	Entire document	Waymo
Exhibit 39 to Uber’s Opposition	Entire document	Waymo
Exhibit 40 to Uber’s Opposition	Entire document	Waymo
Exhibit 42 to Uber’s Opposition	Entire document	Waymo
Exhibit 43 to Uber’s Opposition	Entire document	Waymo
Exhibit 44 to Uber’s Opposition	Entire document	Waymo
Exhibit 46 to Uber’s Opposition	Entire document	Waymo

3. Waymo’s Motion and exhibits thereto, and exhibits to Uber’s Opposition also contain, reference, and/or describe Waymo’s confidential business information, which Waymo seeks to seal. Specifically, the portions sought to be sealed describe confidential valuations of Waymo’s businesses, confidential details regarding the results of Waymo’s efforts in searching for documents in this litigation, and details regarding Waymo’s security measures, protocols and detailed computer forensics regarding access to Waymo’s trade secrets. Public disclosure of this information to Waymo’s competitors would harm Waymo by giving its competitors access to Waymo’s highly confidential internal business thinking and because its security measures and computer forensics methods would become known to competitors who could use such information to Waymo’s disadvantage.. Waymo’s request to seal is narrowly tailored to only the confidential information.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
2 true and correct, and that this declaration was executed in San Francisco, California, on September 13,  
3 2017.

4 By /s/ Lindsay Cooper  
5 Lindsay Cooper  
6 Attorneys for WAYMO LLC

7 **SIGNATURE ATTESTATION**

8 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
9 filing of this document has been obtained from Lindsay Cooper.

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11 /s/ Charles K. Verhoeven  
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